

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA

JANE DOE II

Plaintiff,

vs.

JEFFREY EPSTEIN,
and SARAH KELLEN,

Defendants.

CASE NO.

2008 CA 02 06 14 XXXX MB

2009 JUL 10 PM 3:08

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COMPLAINT

1. Plaintiff, JANE DOE II, hereby sues JEFFREY EPSTEIN and SARAH KELLEN, and states:

JURISDICTION AND VENUE

2. This is an action for damages in excess of \$15,000, exclusive of interests and costs.
3. Venue is proper in this Court as all acts occurred in Palm Beach County and all parties reside and/or do business herein.

PARTIES

4. Ms. DOE II is a natural person residing in Palm Beach County, Florida. During the events giving rise to this claim, she was a minor but has now reached majority.

5. Defendant EPSTEIN is a natural person who resides and/or does business in Palm Beach County, Florida, and who committed the acts alleged within the jurisdiction of Palm Beach County, Florida. Defendant KELLEN is believed to reside in the State of New York, but committed

the acts alleged within the jurisdiction of Palm Beach County, Florida.

6. Defendant EPSTEIN is believed to now be incarcerated in the Palm Beach County Jail for crimes committed that are related and/or similar to the claims in this case.

FACTS

7. Defendant EPSTEIN was, at all times relevant to this action, a part time resident of Palm Beach, Florida. All acts complained of herein occurred at his estate residence in Palm Beach, Florida.

8. Defendant EPSTEIN has a history of enticing young women, under the age of consent, to private sessions that begin with massages and evolve, through his acts of solicitation by use of his lavish wealth, into sexual encounters, wherein Defendant EPSTEIN fulfills sexual fantasies by using said young women.

9. Defendant EPSTEIN, in agreement with two (2) persons he employed for this purpose, HALEY ROBSON and Defendant KELLEN, conspired with these other two Defendants to solicit young women of the type Defendant EPSTEIN preferred, blonde, attractive in appearance, and younger than the age of legal consent, to provide sexual gratification for him.

10. Defendants EPSTEIN and KELLEN entered into a criminal conspiracy to solicit young women for acts of prostitution, including the Plaintiff.

11. From about June or July, 2008 until February, 2005, Defendants EPSTEIN and KELLEN solicited the Plaintiff to come to Defendant EPSTEIN's home and provide "massages" for him. Defendant EPSTEIN corrupted young girls, such as Plaintiff, into engaging in sexual acts to designed to fulfill his unnatural sexual desires for young women or even younger girls who were under the age of consent. These acts included his requests that he wanted the encounter to be like a

“porn video.” Defendant EPSTEIN would script lines for Plaintiff to say, including calling out his name and requesting that he perform a certain sexual act “harder,” while he touched the Plaintiff’s vagina with a vibrator or with his fingers; alternately, he would masturbate in the presence of the Plaintiff after demanding her to disrobe and walk in front of him in provocative sexual poses.

12. Defendant EPSTEIN touched Plaintiff’s vagina, or penetrated Plaintiff’s vagina, using his fingers and/or a vibrator on multiple occasions, during the time that Plaintiff was a minor.

COUNT I: SEXUAL BATTERY

13. Plaintiff reasserts and alleges, as if fully set forth in Count I, the allegations of ¶¶ 1-12, supra.

14. Defendant EPSTEIN unlawfully touched the Plaintiff without Plaintiff’s consent, and before she reached the age of consent, with the intention of bringing about a harmful and offensive contact.

15. As a direct and proximate result of said unlawful touching, plaintiff suffered physical injuries, severe emotional distress, mental anguish and distress, humiliation and embarrassment and continues to suffer so today.

WHEREFORE, Plaintiff respectfully requests that this Court:

A. Award Plaintiff compensatory damages for humiliation, loss of reputation, mental anguish and pain and suffering; and

B. Award Plaintiff her costs of this action.

COUNT II: CIVIL CONSPIRACY

16. Plaintiff reasserts and alleges, as if fully set forth in Count I, the allegations of ¶¶ 1-12, supra.

17. Defendants entered into a criminal conspiracy to solicit young women for the sexual gratification of Defendant EPSTEIN, including, but not limited to, soliciting the Plaintiff and others like her for him to exploit and take advantage of their youth, inexperience and financial need.

18. As a direct and proximate result of said unlawful touching, plaintiff suffered physical injuries, severe emotional distress, mental anguish and distress, humiliation and embarrassment and continues to suffer so today.

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Award Plaintiff compensatory damages for humiliation, loss of reputation, mental anguish and pain and suffering; and
- B. Award Plaintiff her costs of this action.

JURY DEMAND

PLAINTIFF DEMANDS A JURY TRIAL ON ALL ISSUES SO TRIABLE.

Respectfully submitted,



ISIDRO M. GARCIA
Florida Bar No.: 437883
GARCIA, ELKINS & BOEHRINGER, P.A.
224 Datura St., Ste. 900
West Palm Beach, FL 33401
Telephone: (561) 832-8033
Telecopier: (561) 832-7137
E-mail: isidrogarcia@bellsouth.net
COUNSEL FOR PLAINTIFF

Dated: July 10, 2008

R E C E I P T

PALM BEACH CTY CIR CT JISPROD

Receipt Number: CAMB227404

Date: 10-JUL-2008

Cashier: DLAFFERTY

Payor: ISIDRO MANUEL GARCIA
Addr: 224 DATURA ST
#900 THE HARVEY BUILDING
WEST PALM BEACH, FL 33401

Violation/Docket	Description	Amount
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Party: JANE DOE II

CAFF		236.00
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CAFF		20.00
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CHECK RECEIVED GENERAL ACCT		-256.00
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Total Fees:	256.00
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Total Payment:	256.00
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